

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ABG JUICY COUTURE, LLC,	)	
	)	
Plaintiff,	)	Case No. 1:25-cv-03396-TWT
	)	
v.	)	
	)	
10JQKA Official Store, et al.,	)	
	)	
Defendants.	)	
<hr style="width: 40%; margin-left: 0;"/>	)	

**DEFENDANTS’ OPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO COMPLAINT**

Defendants Acxadky, Ecqfecm, Gprjwfq, Hbygcmt, Hhwxjez, Kfndrtj, Khgref, Laxuubx, Lpgakps, Lvgzocv, Mezpxcq, Mveoroh, PBHVNYH, PCtzxe, Pgumiqq, RDARDP, Sfeergz, Shkqabm, Tinare, Txmvypi, UOYTOH, Uvtjh, Vatqadw, VETIA, Ypjfpav, Yxfhko, Zqxpbd, Ztvculb, Auizdfr, Mqsapei, and UNamimiyaNU (“Defendants” hereinafter), by and through their undersigned counsel, hereby respectfully request an extension of time of twenty-one (21) days from the date of filing of this motion, or up to and including September 1, 2025, to respond to the Complaint [Doc. 3] filed by ABG JUICY COUTURE, LLC, (“Plaintiff”). In support thereof, the Defendants state as follows:

1. Plaintiff filed its Complaint on June 18, 2025. [Doc. 3].

2. Plaintiff allegedly served Defendants on July 14, 2025. [Doc. 13].

3. Defendants were allegedly required to file their answer no later than August 4, 2025.

4. Defendants' undersigned counsel reached out to Plaintiff's counsel on July 17, 2025, requesting the evidence and demand to participate in settlement negotiations. *See Exhibit A*. After multiple follow-up emails thereafter, Plaintiff sent the evidence as to each of the above listed Defendants on July 30, 2025. *Id*.

5. Plaintiff's counsel and Defendants' counsel are still participating in settlement negotiations. *Id*.

6. On August 7, 2025, Defendants' counsel requested a twenty-one (21) day extension from Plaintiff's counsel, to which Plaintiff's counsel responded,

Please note that all defendants were served on July 14, 2025 and therefore the answer deadline lapsed on August 4, 2025. Accordingly, we cannot extend a lapsed deadline.

That said, we can agree to refrain from taking adverse action against the defendants that you represent so long as the parties are engaged in active good faith settlement negotiations.

*See Exhibit A*.

7. As a result, Defendants respectfully request an extension of twenty-one (21) days from the date of filing this motion, up to and including September 1, 2025, for the parties to continue in settlement negotiations.

8. This motion for extension of time is not interposed for delay and will not prejudice any party.

9. This is Defendants' first request for an extension of time.

### **PRAYER FOR RELIEF**

Wherefore, Defendants respectfully request that the Court grant this motion for extension of time to respond to Plaintiff's Complaint [Doc. 3], up to and including September 1, 2025, and for all other relief the Court deems just.

Respectfully submitted this 11th day of August, 2025.

/s/ John W. Sandifer

John W. Sandifer  
GA Bar No. 626026  
*Attorney for Defendants*  
125 Clairemont Avenue  
Two Decatur TownCenter, Suite 420  
Decatur, GA 30030  
Telephone: 404-995-9000  
jsandifer@sandifer-law.com

/s/ Lydia Pittaway

Lydia Pittaway  
FL Bar No. 0044790\*  
*\*Pro Hac Vice Application Submitted*  
*Attorney for Defendants*

Ford Banister IP  
305 Broadway - Floor 7  
New York, NY 10007  
Telephone: 212-500-3268  
lpittaway@fordbanister.com

/s/ Sandra Cristina Perez  
Sandra Cristina Perez  
FL Bar No. 0051392\*  
*\*Pro Hac Vice* Application Submitted  
*Attorney for Defendants*  
Ford Banister IP  
305 Broadway - Floor 7  
New York, NY 10007  
Telephone: 212-500-3268  
scperez@fordbanister.com

### **CERTIFICATE OF FONT & SIZE SELECTION**

Pursuant to LR 5.1, NDGa., I certify that this paper was prepared with Times New Roman font with (14) size font and point selections approved by the Court in LR 5.1, NDGa.

/s/ John W. Sandifer

### **CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2025, I electronically filed DEFENDANTS' OPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

**Carrie A. Hanlon**  
The Sladkus Law Group

**Jason Harris Cooper**  
The Sladkus Law Group

**Ravindra Rayasam**  
Ghanayem and Rayasam, LLC

/s/ John W. Sandifer